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*Attorneys for Creditors Beverly Curtis, Michael Green, Harry Allan and Jo Ann Knopp, Scherry Lee, Estate of Russell Monaco, Harley Morrell, and Annette Thomas*

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE DISTRICT OF MONTANA BILLINGS DIVISION

**STIPULATION FOR WITHDRAWAL OF DEBTOR'S OBJECTIONS TO  
PERSONAL INJURY CREDITORS' PROOFS OF CLAIM**

Creditors Beverly Curtis, Michael Green, Harry Allan and Jo Ann Knopp, Scherry Lee, Estate of Russell Monaco, Harley Morrell, and Annette Thomas (“Personal Injury Creditors”) by and through their attorney James A. Patten, and the Debtor in the above-captioned Chapter 7 bankruptcy proceeding, John Henry Schneider by and through his attorney James H. Cossitt, (collectively “Parties”) do hereby stipulate as follows:

## **RECITALS**

1. The Debtor filed his voluntary petition under Chapter 7 of the Bankruptcy Code on December 4, 2014. (Bankruptcy Dkt. No. 1).
2. Within the Debtor's schedules he disclosed some 340 pages (Bankruptcy Dkt. No. 17, pp. 15 – 355) of "possible negligence claims" within Schedule F, listing the Personal Injury Creditors among them. (*See* Schedules, Bankruptcy Dkt. No. 17).
3. The Chapter 7 Trustee filed a Motion to Fix Claims Bar Date on January 14, 2015, and the Court fixed the date at April 14, 2015. (*See* Bankruptcy Dkt. No. 22).
4. The Personal Injury Creditors thereafter filed their Proofs of Claim ("Personal Injury Claims") against the bankruptcy estate. (*See* Proof of Claim Nos. 14; 16 – 21).
5. The Personal Injury Claims were objected to by the Debtor (*See* Dkt. Nos. 237-38; 257; 274-77) (the "Objections").
6. The Debtor's Objections were set for hearing May 24, 2016.

## **STIPULATION**

1. In consideration for the Agreement for Contractual Discharge and Waiver of Objections to Proofs of Claim with the Personal Injury Creditors of even date

herewith, the Debtor shall immediately withdraw his Objections to the following Claims:

- a. Beverly Curtis – Proof of Claim #19;
  - b. Michael Green – Proof of Claim #14;
  - c. Harry Allen and JoAnn Knopp – Proof of Claim #10;
  - d. Scherry Lee – Proof of Claim #18;
  - e. Estate of Russell Monaco – Proof of Claim #21;
  - f. Harley Morrell – Proof of Claim #17; and
  - g. Annette Thomas – Proof of Claim #16.
2. The Debtor hereby consents to allowance of the foregoing Proofs of Claim.

**SO STIPULATED** this 23rd day of May, 2016.

**JAMES H. COSSITT, PC**  
P.O. Box 1889  
Kalispell, MT 59903

By: /s/ James H. Cossitt  
James H. Cossitt  
Attorney for Debtor John Henry Schneider

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By: /s/ J.A. Patten  
James A. Patten  
Attorney for Personal Injury Creditors

### **CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify, under penalty of perjury, that on the 23<sup>rd</sup> day of May, 2016, a copy of the foregoing was electronically by the Court's ECF notice to all persons/entities requesting special notice or otherwise entitled to the same and that in addition service by mailing a true and correct copy, first class mail, postage prepaid, was made to the following persons/entities who are not ECF registered users: None.

By: /s/ J.A. Patten  
For Patten, Peterman, Bekkedahl & Green,  
PLLC